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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHELLE MALUAFITI,

Plaintiff,

vs.

RUSHMORE LOAN SERVICING, LLC,

Defendant.

Case No.: 2:20-cv-01663-JCM-VCG

**STIPULATION FOR EXTENSION OF
TIME FOR PLAINTIFF TO FILE
RESPONSE TO DEFENDANT'S MOTION
TO DISMISS**

(Second Request)

MICHELLE MALUAFITI ("Plaintiff") and Defendant RUSHMORE LOAN MANAGEMENT SERVICES, LLC ("Rushmore"), incorrectly named "Rushmore Loan Servicing, LLC" in the Complaint, collectively the "Parties", hereby jointly stipulate and agree to allow an extension of time for Plaintiff to file a response to Rushmore's Motion to Dismiss Plaintiff's Complaint ("Motion to Dismiss") to **December 10, 2020.**

The Motion to Dismiss was filed on October 22, 2020 and appears on the docket as ECF #5. Plaintiff's current deadline to respond to the Motion to Dismiss is November 19, 2020. The reason for the request is two-fold: (1) counsel for Plaintiff needs additional time to fully examine and respond to the arguments and legal analysis set forth in the Motion to Dismiss and whether an amended complaint could address the issues raised or whether a quick resolution to the matter may be available; and (2) due

1 to COVID-19 and the State of Nevada's recent restrictions, Plaintiff's counsel has had to cancel its
 2 meeting with Plaintiff and will need a few weeks to reschedule that meeting to review information with
 3 the Plaintiff concerning the Motion to Dismiss. This is Plaintiff's second request for an extension.
 4 Rushmore will not be prejudiced by the delay and has agreed to the extension of time. This stipulation
 5 has not been submitted for the purpose of delay or other impermissible purpose.

6
 7 Stipulated and agreed on this date: November 13, 2020.

8
 9 /s/ Shawn W. Miller

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16 /s/ Jeffrey S. Allison

17 Jeffrey S. Allison, Esq.
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22
 23 **ORDER GRANTING EXTENSION OF TIME**

24 IT IS SO ORDERED.

25
 26 
 27 _____
 28 UNITED STATES DISTRICT JUDGE

Dated: November 20, 2020